

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Afraaz R. Irani, M.D.,)	
)	
Plaintiff,)	
v.)	C/A No. _____
)	
Palmetto Health; University of South Carolina)	
School of Medicine; David E. Koon, Jr., M.D.,)	
etc.; John J. Walsh, IV, M.D., etc.)	
)	
Defendants.)	
_____)	

**DEFENDANTS' ANSWERS TO
LOCAL CIVIL RULE 26.01 INTERROGATORIES**

Defendants answer the Court's Local Civil Rule 26.01 Interrogatories as follows.

INTERROGATORY A:

State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER TO INTERROGATORY A:

None at this time.

INTERROGATORY B:

As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER TO INTERROGATORY B:

Nonjury, at the parties request.

INTERROGATORY C:

State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding

shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER TO INTERROGATORY C:

None of the Defendants are a publicly owned company.

INTERROGATORY D:

State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civil Rule 3.01.

ANSWER TO INTERROGATORY D:

Plaintiff has alleged causes of action occurring mostly, if not entirely, in Richland County, South Carolina. Thus, the Columbia Division is the proper division in which to assert Plaintiff's claims.

INTERROGATORY E:

Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER TO INTERROGATORY E:

Defendants are unaware of any related matters filed in this District.

INTERROGATORY F:

If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER TO INTERROGATORY F:

All Defendants are properly identified.

INTERROGATORY G:

If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER TO INTERROGATORY G:

Defendants deny that they are liable to Plaintiff on any claim. At this time, Defendants are not aware of any other person or legal entity which is liable to them or to Plaintiff regarding the claims asserted by Plaintiff in this litigation.

[SIGNATURE PAGE TO FOLLOW]

Dated this the 8th day of September 2014.

Respectfully submitted,

GIGNILLIAT, SAVITZ, & BETTIS, L.L.P

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.

By: s/Kathryn Thomas
Kathryn Thomas (Fed ID No. 5134)

By: s/Katherine Dudley Helms
Katherine Dudley Helms (Fed ID No. 1811)

s/Fred Williams
Fred A. Williams (Fed ID No. 9934)

s/Todd S. Timmons
Todd S. Timmons (Fed ID No. 11254)

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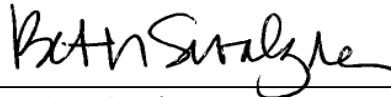
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CERTIFICATE OF SERVICE

I, Beth A. Swalgren, do hereby certify that the foregoing **DEFENDANTS' ANSWERS TO LOCAL CIVIL RULE 26.01 INTERROGATORIES** has been served upon the following person electronically via the Court's Electronic Case Filing system, as well as by certified mail, return receipt requested, properly addressed, and with the correct amount of postage affixed thereto:

David E. Rothstein, Esq.
Rothstein Law Firm, PA
514 Pettigru Street
Greenville, SC 29601

Dated this 8th day of September 2014.

A handwritten signature in black ink, appearing to read "Beth Swalgren", is written over a horizontal line.

Beth A. Swalgren
Legal Assistant to Katherine Dudley Helms

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